

# ATTACHMENT 5



JOANNA BANKS

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Target Audience	Media	Time	Provider	Price
Employees who handle waste	eLearning	30 Minutes	PureSafety	\$0.00

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**Description**

Whenever you generate hazardous waste and accumulate it on-site, you must take the necessary precautions and steps to prevent any sudden or accidental release into the environment. This course explores the actions you must take to carefully operate and maintain your facility and therefore, reduce the possibility of fire, explosion and release of hazardous waste.

**Topics Covered**

- Preparing for and preventing accidents.
- Planning for emergencies.
- Good housekeeping/establishing a safe environment.
- Inspections.

**Required Audience**

Employees who handle waste in any part of their job are required to complete this course.

**Expiration Period**

This course must be completed every year.

**Learning Materials**

This course can be completed individually as eLearning or delivered by a facility manager in a group setting. Managers delivering this training should use the eLearning course as their presentation. Additional tools and resources about this topic can be accessed from the [RCRA EH&S Training Resource site](#).

**Obtaining Course Credit**

Employees completing the eLearning course must pass a test to receive credit. Managers delivering this training should provide a roster to the LMS Training Manager at their facility so credit can be granted to participants.

**System Requirements**

This course is best viewed using an Ashland standard system. The following system requirements are required to view this course:

- Windows® -based computer
- Internet Explorer® browser 5.5 or higher
- Adobe® or Macromedia Flash® Players
- Screen resolution: 1024x768 or higher
- Pop-up or ad blocking software must be turned off
- System Font size: Normal
- Browser Text Size: Medium

If you experience technical problems, contact the Ashland IT Service Desk.

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**Issues or Conce**

Please e-mail us at [LMSSupport@ashland.com](mailto:LMSSupport@ashland.com) Or call us at 614-790-1  
System Requirements: A Windows based computer and Internet Explorer 5.0 or h

# ATTACHMENT 7

ELKTON PLANT  
EMERGENCY MANUAL

Orig. Issue Date June 1974  
Last Revision Date June 2009  
Reviewed By Renie Stack

Procedure No. 25  
Page No. 1

SUBJECT: EMERGENCY SPILL, RELEASE AND RESPONSE PROCEDURES  
(SPCC, SPPP, RCRA CONTINGENCY)

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**I. PURPOSE**

The objectives of this plan include:

1. To identify potential areas in the Elkton Plant where storm water contamination could occur.
2. To establish procedures for the prevention of spills which could lead to contamination of storm water.
3. To develop a plan of action for rapid and effective response of plant personnel to releases, fire, or explosions.
4. To serve as the Emergency Spill, Release and Response Plan for the Elkton Plant which combines the following:
  - a. Spill Prevention Control and Countermeasure Plan Procedure (SPCC)
  - b. Storm Water Pollution Prevention Plan (SPPP)
  - c. Resources Conservation and Recovery Act (RCRA) Contingency plan
5. The Emergency Spill, Release and Response Plan assists in the compliance with the following:
  - a. Clean Water Act requirements for Oil Pollution Prevention, 40 CFR part 112 (3) (a).
  - b. Water Resources Administration requirements for oil handling permits. (Permit 87-0P- 0176, Page 7, Contingency Plan.)
  - c. Resources Conservation and Recovery act (RCRA) requirements for being a hazardous waste generator, 40 CFR Part 262.34 (a) (4).
  - d. Comprehensive Environmental Response, Compensation, and Liability Act (Superfund) and Superfund Amendments and Reauthorization Act.
  - e. State of Maryland, Department of Environment, Disposal of controlled Hazardous Substances, COMAR 26.13.03.
  - f. State of Maryland, Department of Environment, General Discharge permit No. 92-GP-0001
  - g. All applicable regulations promulgated by the State of Maryland and the Town of Elkton.
  - h. Storm water discharges (applicable to State NPDES programs), 40 CFR Part 112.26 (a) (4).

**II. SCOPE**

- A. This practice applies to all employees of the Ashland, Inc., Elkton Plant and all visitors and contractors to the plant.
- B. This plan applies to releases on the property of Ashland Inc., Elkton, MD. Employees are never to provide "hands-on" assistance to off-site chemical releases.
- C. The provisions of the plan must be carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment.
- D. Copies of this contingency plan, including all revisions, are maintained at the Elkton Plant in strategic locations and have been submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services.

**III. RESPONSIBILITY**



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- A. The Plant Manager has overall responsibility for the execution of this procedure. The Site Supervisor, Production Supervisor, and all other appropriate personnel are responsible as the Plant Manager sees fit.
- B. The Emergency Coordinator for the site is the Plant Manager. In the event that the plant manager is unavailable, the Site Supervisor will assume the role. Contact information (name, home address, home and business phone numbers) for these individuals is included below:

<b>Emergency Coordinator</b>	<b>Back up Emerg. Coord.</b>
Mike Billow, Plant Manager	Bill Hill, Site Supervisor
	30 Canal Estates Drive
	Elkton, MD 21921
(CELL) 862-591-7881	(HM) 410-885-2565
	(CELL) 410-920-6407
(WK) 410-392-8814	(WK) 410-392-8829

Sam Park, Production Supervisor	
156 Sunnybrook Drive	
Elkton, MD 21921	
(HM) 410-620-4264 (CELL 410-920-6404)	
(WK) 410-392-8835	

- C. The contingency plan must be reviewed, and immediately amended, if necessary, whenever:
1. Applicable regulations are revised;
  2. The plan fails in an emergency;
  3. The facility changes--in its design, construction, operation, maintenance, or other circumstances--in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;
  4. The list of emergency coordinators changes (refer to EPM 1); or
  5. The list of emergency equipment changes.
- D. Copies of the Contingency Plan have been distributed to the following (see file E34 for copies of certified receipt):
- |   |   |
|---|---|
| Ashland, Inc.<br>Elkton Plant<br>329 West Main Street<br>Elkton, MD 21921 | Police<br>Town Administrator<br>100 Railroad Ave. P.O. Box 157 Elkton MD 21922<br>(for appropriate sub-distribution to police and public works) |
|---|---|

\*Cecil County Emergency Management & Civil Defense Director  
Room 6 - County Office building - Elkton, MD 21921

\*Fire Department / Civil Defense  
Fire Chief - Slingerly Fire company  
P. O. Box 444 - Elkton, MD 21921

Maryland Department of the Environment  
Technical & Regulatory Services Admin.  
1800 Washington Blvd.  
Baltimore, MD 21230  
[www.MDE.state.MD.US](http://www.MDE.state.MD.US)

\* Written agreements to provide Emergency services is obtained and kept on file. See Appendix L.

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**IV. STORM WATER POLLUTION PREVENTION TEAM**

As a requirement of the Storm Water Discharge Permit the facility shall assemble a Storm Water Pollution Prevention Team. The team members will be responsible for the implementation, maintenance, and revision of the Emergency Spill Release and Response Plan. The following Table contains a list of the Team members and their assigned responsibilities:

Member	Title	Responsibility
Mike Billow	Plant Manager	Overall responsibility for the development, update and implementation of this plan.
Renie Stack	EH&S Manager	Oversee regulatory requirements; ensure training as per specifications in the plan; oversee monitoring and analysis.
Renie Stack	EH&S Manager	Coordinating inspections; coordinate process changes; responsible for maintenance program; insure integrity of storm water plan with respect to projects and process changes. Responsible for initiating projects to maintain and/or improve spill controls and storm water flows
Bill Hill / Sam Park	Site Supervisor / Production Supervisor	Spill Response Coordinator. Oversees housekeeping and loading/unloading operations. Coordinate employee training per SPPP/SPCC/RCRA requirements.

**V. SECURITY**

- A. The entire perimeter of the facility is fenced. The main gate, located on Main Street, is controlled during regular business hours by the receptionist in the main administration office and by the shift personnel during all other times. The rail spur gate, located in the northeast corner of the facility is locked at all times except for delivery or removal of rail cars.
- B. Facility lighting is adequate in all production, storage, and rail car/truck transfer areas for detecting spills during night hours.

**VI. POTENTIAL POLLUTANT SOURCES**

Potential storm water contamination could result primarily from the following areas:

- A. North Product Storage Area      Diked
- B. Raw Material Storage Area      Diked
- C. South Product Storage Area      Diked
- D. Effluent Tank/East Storage Area      Diked
- E. Vinyl Acetate Truck Unloading      Curbed
- F. Gas and Used Oil Storage Area      Diked
- G. XX Shed Storage Area      Diked
- H. Rail Car and Fuel Oil Unloading      Bermed
- I. Underground Storage Tanks      Below Grade

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All storage areas have secondary containment systems that can prevent leaks and spills as well as contaminated storm water from being discharged from the facility grounds except through the municipal sewer system. All secondary containment systems are equipped with a lockout device and lock to prevent accidental release. Tank truck loading/off-loading areas are graded to sumps and/or curbed to prevent spills from being released.

Rain water collected within the secondary containment systems during storm events is checked visually for signs of contamination and for odors by the operator before the water is released. If contamination is detected, the water will be pumped to effluent tanks for pretreatment prior to discharge to the municipal sewer system.

SWP 13 (Vinyl Acetate Unloading), SWP 42 (Loading Railcars), SWP 55 (Tank Truck Unloading), and SWP 56 (Tank Truck Loading), outline procedures to minimize spills and prevent storm water contamination. (see also PRSPP 13 -- Opening Lines and Vessels).

All of the manufacturing processes are conducted within enclosed buildings. The buildings have floor trenches located at their entrances to capture any leaks and/or spills that may occur. Liquids which enter the floor trench system are pumped to the waste water pretreatment building.

See facility site map (Appendix E) for drain patterns for each drainage area.

## VII. STORM WATER DRAINAGE AREAS

The following areas list the tanks, material of construction (MOC), contents, and capacities for the storm water drainage areas at Elkton. A narrative description of the control measures for each section of the area is also included. Direction and rate of flow are not estimated, because the tanks have a secondary containment to prevent spills or leaks to the environment. If, however, a leak or spill does occur, the plant is built such that the material will drift towards the front of the plant site. The tanks on site have an atmospheric temperature and pressure. Also, it is Ashland, Inc. policy and procedure to cap all inactive lines.

### AREA 1

A high pH effluent problem was identified in the storm water draining from the grassy area in Area 1. The high pH is attributed to lime which was deposited in the area during the time period the facility was used for the manufacture of acetylene. A clay cap was installed in August 1998, over the area to prevent the rainwater from contacting the lime.

#### A. NORTH PRODUCT STORAGE AREA

- North Product Storage Area [Map Area 2]  
Gross Dike Capacity = 2,560 cubic feet (19,140 gallons)  
Control Measure(s): Secondary containment with concrete diked walls.

<u>TANK</u>	<u>I.D. Number</u>	<u>MOC</u>	<u>CONTENTS</u>	<u>VOLUME</u> <u>(GAL)</u>
1	FB - 244	Stainless St.	Caustic/Methanol <sup>1</sup> Solution	16,000

<sup>1</sup>Methanol is a SARA 313 chemical.

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2	FB - 425	Fiberglass	Finished Product Storage	25,000
3	FB - 426	Fiberglass	Finished Product Storage	25,000
4	FB - 427	Fiberglass	Finished Product Storage	25,000
5	FB - 428	Fiberglass	Finished Product Storage	25,000
6	FB - 429	Fiberglass	Finished Product Storage	25,000
7	FB - 430	Fiberglass	Finished Product Storage	25,000
8	FB - 431	Fiberglass	Finished Product Storage	25,000
9	FB - 435	Fiberglass	Finished Product Storage	25,000

2. Truck Product Loading [Map Area 2]  
Control Measure(s): All rain water is directed to a trench and if contaminated, transferred to the rail car sump. Water in the sump is pumped to effluent tanks for waste water pretreatment.
3. Butyl Acrylate<sup>2</sup> Unloading [Map Area 2]  
Trucks carrying raw materials may potentially leak or spill materials onto the roadway while unloading raw materials. Control Measure(s): Trucks are continuously manned during unloading, therefore, spills would immediately be detected.
4. Cooling Towers [Map Area 2]  
Control Measure(s): The towers are tested monthly to check for contamination.
5. Polyvinyl Alcohol Solution Process Tank [Map Area 2]  
This material is neither hazardous nor toxic. The tank is located in a high traffic area and undergoes frequent informal visual inspections. The tank level is maintained at or above 48% capacity.

<u>TANK</u>	<u>I.D. Number</u>	<u>MOC</u>	<u>CONTENTS</u>	<u>VOLUME (GAL)</u>
1	FA - 227	Stainless St.	PVOH Solution	6500

B. RAW MATERIAL STORAGE AREA

1. Raw Material Storage Area 1 [Map Area 2]  
Gross Dike Capacity = 1,254 cubic feet (9,380 gallons)

<u>TANK</u>	<u>I.D. Number</u>	<u>MOC</u>	<u>CONTENTS</u>	<u>VOLUME (GAL)</u>
1	FB - 114	Carbon St.	Igepal CO-630*	2,700
2	FB - 115	Carbon St.	Igepal CO-880*	2,700
3	FB - 117	Carbon St.	Pluronic F-68*	6,000
4	FB - 118	Carbon St.	Pluronic L-64	6,300

Control Measure(s): Secondary containment with concrete diked walls. Capacity of dike is sufficient to hold largest tank and freeboard rain.

\* These tanks have internal steam heating coils. The condensate return tank is visually checked weekly for contamination.

<sup>2</sup>Butyl Acrylate Monomer is a SARA 313 chemical.

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2. Raw Material Storage Area 2 [Map Area 2]

Gross Dike Capacity = 2,419 cubic feet (18,100 gallons)

Control Measure(s): Secondary containment with concrete diked walls.

<u>TANK</u>	<u>I.D. Number</u>	<u>MOC</u>	<u>CONTENTS</u>	<u>VOLUME (GAL)</u>
1	FB - 501	Stainless St.	Triton X-305 / Iconol OP30(70)	6,000
2	FB - 502	Stainless St.	Triton X-100 / Iconol OP10	6,000
3	FB - 125	Fiberglass	Igepal 887	6,000
4	FB - 126	Stainless St.	Rhodafac RE-610	3,100
5	FB - 130	Carbon St.	Ammonium Hydroxide 29% <sup>3</sup>	7,000
6	FB - 127	Stainless St.	SVS	6,000
7	FB - 109	Carbon St.	Dioctyl Maleate	16,000

3. Raw Material Unloading [Map Area 2]

Trucks carrying raw materials may potentially leak or spill materials onto the roadway while unloading to the raw material storage areas. Control Measure(s): Trucks are continuously manned during unloading, therefore, spills would immediately detected.

4. Nitrogen Tank

Control Measure(s): None necessary since nitrogen returns to the atmosphere if released.

5. Hot DI Water Tank

Control Measure(s): None necessary since tank contents are water.

C. SOUTH PRODUCT STORAGE AREA

1. South Product Storage Area [Map Area 4]

Gross Dike Capacity = 2,380 cubic feet (17,772 gallons)

Control Measure(s): Secondary containment with concrete diked walls.

<u>TANK</u>	<u>I.D. Number</u>	<u>MOC</u>	<u>CONTENTS</u>	<u>VOLUME (GAL)</u>
1	FB - 418	Fiberglass	Finished Product Storage	20,000
2	FB - 419	Fiberglass	Finished Product Storage	20,000
3	FB - 421	Fiberglass	Finished Product Storage	20,000
4	FB - 422	Fiberglass	Finished Product Storage	20,000
5	FB - 423	Fiberglass	Finished Product Storage	20,000
6	FB - 424	Fiberglass	Finished Product Storage	20,000

2. Truck Product Loading [Map Area 7]

Sump capacity = 9 cubic feet (65 gallons)

Control Measure(s): All rain water is directed to a sump and transferred to waste water pretreatment.

3. Emergency Generator Diesel Fuel Storage Area [Map Area 5]

Gross Dike Capacity = 23 cubic feet (170 gallons)

Control Measure(s): Secondary containment with metal diked walls.

<sup>3</sup>Ammonia is a SARA 313 chemical.

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<u>TANK</u>	<u>I.D. Number</u>	<u>MOC</u>	<u>CONTENTS</u>	<u>VOLUME (GAL)</u>
1	FB - 525	Carbon St.	Diesel Fuel	275

D. EFFLUENT/EAST STORAGE AREA

1. Effluent/East Storage Area [Map Area 5]

Gross Dike Capacity = 3,410 cubic feet (25,530 gallons)

Control Measure(s): Secondary containment with concrete diked walls. Capacity of dike is sufficient to hold largest tank and freeboard rain.

<u>TANK</u>	<u>I.D. Number</u>	<u>MOC</u>	<u>CONTENTS</u>	<u>VOLUME (GAL)</u>
1	FB - 106 A	Stainless St.	Effluent Tank	6,000
2	FB - 112 C	Carbon St.	Effluent Tank	5,000
3	FB - 113 B	Carbon St.	Effluent Tank	16,000
4	FB - 432	Fiberglass	Finished Product Storage	25,000
5	FB - 433	Fiberglass	Finished Product Storage	25,000
6	FB - 434	Fiberglass	Finished Product Storage	25,000
7	Tote		Atticide	300

E. VINYL ACETATE<sup>4</sup> UNLOADING

1. Vinyl Acetate Unloading [Map Area 3]

Sump capacity = 480 cubic feet (3,590 gallons)

- Control Measure(s): Vinyl Acetate is currently received and unloaded primarily by rail car. It is unloaded from the top of the rail car with an internal dip pipe. This means there is no opening of the bottom of the car, which is valved and capped. There is a vacuum breaker in the unloading line, which: a) drains lines to the tank after use, and b) prevents a spill from siphoning under several potential failure modes.
- The loading/unloading area is curbed and graded. Rain water is collected in a catch basin located within the curbed area. Per SWP 13, the drain valve of the basin is closed whenever unloading occurs and is not opened until it is determined by visual and odor inspection to be free of contaminants.
- In the unlikely event of a minor spill, a metal track pan under the car drains to a 100 gal. capacity closed concrete sump. In the extremely unlikely event of all the above systems failing and a major spill, the volume of an entire rail car would be contained by ditches of tightly packed bank run. These ditches drain to a valve which stays closed at all times, except during the intentional draining of non-contaminated storm water.

2. Truck Scale [Map Area 3]

<sup>4</sup>Vinyl Acetate is a SARA 313 chemical.

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Control Measure(s): Rain water from the scale is directed east to the catch basin located by the fire water pump house. There is no loading nor unloading done at this location. Before leaving loading / unloading areas and moving onto the scale, all truck connections are capped and secured. A visual inspection of all trucks is required per D.O.T. regulations.

3. Fire Water Tank [Map Area 3]

Gross Dike Capacity = 24 cubic feet (180 gallons)

Control Measure(s): None necessary since tank contents are water.

<u>TANK</u>	<u>I.D. Number</u>	<u>MOC</u>	<u>CONTENTS</u>	<u>VOLUME (GAL)</u>
1	FB-523	Carbon St.	Diesel Fuel	180

F. GASOLINE AND USED OIL STORAGE AREA

1. Gasoline and Used Oil Storage Area [Map Area 2]

Gross Dike Capacity = 60 cubic feet (440 gallons)

Control Measure(s): Secondary containment with concrete diked walls.

<u>TANK</u>	<u>I.D. Number</u>	<u>MOC</u>	<u>CONTENTS</u>	<u>VOLUME (GAL)</u>
1	FB - 521	Carbon St.	Gasoline (Rail car mover)	275
2	FB - 524	Carbon St.	Diesel Fuel	275

The concrete dike is bordered by pavement to the south and east. Therefore, spills in excess of dike volume would flow into gravel areas to the west and north. There are no drainage systems in this area. There are two railroad tracks and a geographical depression hindering flow to the fence line. A spill from secondary containment would not be discharged from the facility.

2. Drum Storage Pad [Map Area 6]

Gross Dike Capacity = 185 cubic feet (1,380 gallons)

The pad is used to store empty waste drums.

Control Measure(s): The pad is graded and curbed to prevent leaks from being discharged. Rain water is released only after visual and odor inspection. In addition, the drain must be attended when open. The sheet runoff resulting from this release will move toward the fence line and collect along the perimeter; however, it will not leave the property due to a geographical depression. Secondary containment with concrete diked walls.

3. Miscellaneous Storage and Salvage Area

Control Measure(s): All equipment being removed from service are cleaned prior to outdoor storage to prevent storm water contamination.

G. XX SHED STORAGE AREA

1. Versene 100 Storage Area [Map Area 5]

Gross Dike Capacity = 110 cubic feet (800 (-vents to same dike as Hydrogen Peroxide) gallons)

Control Measure(s): Secondary containment with concrete diked walls.

<u>TANK</u>	<u>I.D. Number</u>	<u>MOC</u>	<u>CONTENTS</u>	<u>VOLUME (GAL)</u>
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1                      FB - 116                      Carbon St.                      Versene 100                      2,831

2. Hydrogen Peroxide Storage Area [Map Area 5]  
Gross Dike Capacity = 110 cubic feet (800 gallons)  
Control Measure(s): Secondary containment with concrete diked walls.

<u>TANK</u>	<u>I.D. Number</u>	<u>MOC</u>	<u>CONTENTS</u>	<u>VOLUME (GAL)</u>
1	FB - 120	Aluminum	35% H <sub>2</sub> O <sub>2</sub>	500
2	FB - 121	Aluminum	35% H <sub>2</sub> O <sub>2</sub>	500

3. Acticide Tote Storage [Map Area 4]  
Sump capacity = 40 cubic feet (290 gallons)

<u>TANK</u>	<u>CONTENTS</u>	<u>VOLUME (GAL)</u>
1	Acticide	300

Control Measure(s): Acticide container (provided by supplier) sits on an open grate above a sump. Any spills, leaks or water collected in the sump is filtered and used if possible. Otherwise, the Acticide is added to the rail car sump which is pumped to the effluent tanks for pretreatment.

4. T-butyl hydroperoxide Tote storage (Map Area 2)  
Containment capacity = 44 cubic feet (330 gallons)

<u>TANKS</u>	<u>CONTENTS</u>	<u>VOLUME (GAL)</u>
2	T-butyl hydroperoxide	330

Control Measure(s): The t-butyl totes (provided by supplier) sit on an open grate above a containment area. The containment area is sized to handle the entire contents of one full tote. In the event of a spill, the material will be pumped from containment into drums and will be used if possible or disposed of properly.

H. RAIL CAR AND FUEL OIL UNLOADING

1. Rail Car Unloading [Map Area 2]  
Gross Dike Capacity = 480 cubic feet (3,590 gallons)  
Control Measure(s): All off-loading is done from the top of the rail car decreasing the likelihood of a spill. Rain water is collected in a bermed ditch. The valve to the outfall remains closed except to drain after visual and odor inspection of the water.
2. Fuel Oil Unloading [Map Area 2]  
Control Measure(s): Trucks are continuously manned during unloading, therefore, spills would immediately detected.

I. UNDERGROUND BULK STORAGE TANKS

<u>TANK</u>	<u>I. D. Number</u>	<u>MOC</u>	<u>CONTENTS</u>	<u>VOLUME (GAL)</u>
1	FB-003		#2 Fuel oil	10,000



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2	FB-101	Vinyl Acetate (South)	25,000
3	FB-102	Vinyl Acetate (North)	25,000
4	FB-104	Butyl Acrylate (East)	12,000
5	FB-105	Butyl Acrylate (West)	6,000

Underground storage tanks are checked for leaks on a monthly basis. Reference Safety Manual #50 "Underground Leak Monitoring" in the Safe Work Practices for further details.

In the opinion of the Elkton management, the materials stored underground would not reach navigable waters in the case of a tank leak. The excavations for the tanks were made in tight clay and the tanks are inventoried routinely, which would disclose any tank leaks. In case a leak were detected and could not be repaired, the contents would be pumped to a tank truck, rail car or other tank for temporary storage.

### VIII. HAZARDOUS WASTE

The only routine hazardous waste generated at the Elkton Facility is spent caustic methanol. However, there is potential for other sources of hazardous waste (e.g. antifreeze from the heater coils on railcars, parts cleaner, waste created from upset conditions, certain raw material contamination).

As soon as the caustic methanol is determined to be spent, the material is shipped to either Safety-Kleen in Linden, NJ or the DuPont Chambers waste treatment facility in Deepwater, NJ {if TOC <10%} in the event Safety-Kleen is unavailable. An approved LWD or Onyx Incineration facility that is classified as D001 and D002 waste.

Since all hazardous waste is disposed of as soon as it is classified as waste, the Elkton Plant does not have hazardous waste satellite accumulation.

All employees are trained to respond to any abnormal conditions, isolation of any spills and reporting requirements. In addition to the ongoing observation, monthly leak patrols are conducted using an electronic organic vapor monitor with the inspection results filed in the Safety Files. Annual Dike Inspections are conducted and are also documented in the Safety Files.

### IX. GENERAL WASTE ANALYSIS

#### Caustic Methanol

Caustic Methanol is made as an approximately 50% Methanol, 25% Sodium Hydroxide and 25 % water solution for cleaning process vessels. As it is used, Methanol evaporates and caustic strength lessens; therefore, both must be replenished. It becomes waste when it is laden with Polymer solids to a point where it is unusable.

The above information is provided to the disposer who analyzes for Methanol strength, Sodium Hydroxide strength, pH and % PVA solids. These analyses are performed by methods of the disposer's choice. In addition, this Plant may have an outside lab analyze for Flash Point.

As this solution is pumped in and out of storage tanks regularly, and due to the nature of the material, it stays quite uniform throughout. Samples are taken by dropping a "drip-cup" through the tank's top manway well below the liquid surface level.

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Waste Monomer

Contaminated raw materials from dirty truck valves or operator error are the essence of this stream. All additions to this stream are logged. Hazards are conservatively estimated from exactly known ingredients. No sampling or analyses are deemed necessary. This stream does not accumulate during railroad tank car unloading.

**X. MANAGEMENT CONTROLS**

A. Preventive Maintenance

Key systems, such as high-level liquid alarms and high-level alarms on storage tanks, are inspected and tested on a periodic basis as defined in the facility's computerized preventative maintenance tracking system - SAP. Storm water management control equipment has also been added to SAP.

B. Good Housekeeping

Housekeeping is continually stressed as an everyday requirement. Well organized and maintained work areas are a must for safety, health and environmental reasons. Spills and leaks that occur shall be cleaned up, if they occur, as soon as safely possible.

C. Sediment and Erosion Prevention

Erosion is not a problem at the facility as all areas are either covered with vegetation (grass) or with cement/asphalt.

D. Visual Inspections

1. Visual inspections for leaks and/or spills are made on a monthly basis. Visual inspections of above ground piping include valves, flange joints, catch pans, supports, valve locks, and metal surfaces where applicable.
2. Storm water outfalls are inspected once a quarter, during dry periods, for visible signs of discharges. Reminders are generated using the SAP software.
3. Visual inspections of equipment are done as part of the preventative maintenance program. Refer to SAP for all documentation regarding visual inspections.

E. Record Keeping and Internal Reporting Procedures

1. The plant shall maintain records of all incidents, spills or other discharges, for at least 3 years. Records are kept in office storage for 4 years as part of the Corporate Safety & Environmental Near Miss Program. Ashland Corporate Safety also keeps records. Refer to the Environmental file E13.3 and E13.4 for records of any spills or releases and the file E13.2 for Emergency Response Reports and related information.
2. The plant shall maintain records of all storm water discharges from containment for at least 3 years. Appendix I shows a sample storm discharge form. Discharge records are kept in office storage for 4 years.

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3. All monthly outdoor tank inspection records shall be maintained at the facility for a minimum of 3 years. Appendix H shows a sample inspection sheet. Inspection records are kept in office storage for 5 years.
4. All quarterly storm water outfall inspection records shall be maintained at the facility for a minimum of 3 years. Appendix G shows a sample inspection sheet. Inspection records are kept in office storage for 5 years.
5. Any deficiencies noted during an inspection shall be promptly repaired. All maintenance records shall be maintained at the facility for a minimum of 3 years.

**F. Site Compliance Evaluation**

Annual audits are conducted by the Storm Water Pollution Prevention Team. These audits include verification of the storm water plan and contents as well as the implementation of the plan. Revisions will also be done for plant changes as part of the management of change update checklist. Reminders/ticklers are generated using the SAP software. A checklist of requirements can be found in Appendix J. Copies of previous inspections are retained as part of the SPPP (Appendix K) for 3 years.

**G. Treatment**

Storm water is not treated by the facility unless it is determined to contain contaminant. Contaminated storm water shall be pumped to effluent tanks for pretreatment prior to discharge to the municipal sewer system.

**H. Spill Supplies and Emergency Equipment**

Floor Dry is kept in the Records Shed next to the Main Gate. The Production Supervisors are responsible for keeping 600-700 pounds on site. Personal protective equipment is kept throughout the facility. For further details, reference the Safe Work Practices Manual.

**I. Evacuation Plan**

The evacuation plan is contained in EPM #5.

**J. Shut Down Procedure**

The process shut down procedures are located in the manufacturing control rooms (SWP 12).

**XI. COUNTERMEASURE**

Upon detection of a spill condition, an employee will attempt to shut off the source of the leak. Specific countermeasure and corporate notification procedures are addressed in the Plant's Emergency Procedures Manual. These include:

Emergency Telephone Numbers  
Handling Industrial Injuries  
Dealing with Regulatory Agencies  
Fires & Explosions Resulting in Fires  
Evacuation Plan  
Natural Disaster Plan  
Recording significant Adverse Reactions  
Threats, Harassment and Bomb Scares  
External Emergency Response

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Internal Emergency Response (Incident Command)  
Neighborhood Disasters  
Press and Public Relations in Emergencies  
Insurance Incidents  
Third Party Notifications  
Loss of Utilities  
Runaway Reaction / Pre- initiation  
Broken Batch  
Air Pollution

**XII. GENERAL SPILL PROCEDURES**

- A. Immediately take all actions necessary to stop the flow of spilled material at the source.
- B. Take all actions necessary to contain the spilled material.
- C. The subsequent addition of an acidic or alkaline substance to neutralize the spill may be appropriate. However, this may only be done with the approval of the Federal On-scene Coordinator (except within the effluent system) and should only be done if the chemically correct quantity of neutralizing substance can be ascertained. Neutralizing materials are available in the raw material warehouse.

**XIII. INCIDENT REPORT PROCEDURE**

Attached Appendix A is a list of hazardous substances as determined by the U. S. EPA. Included are the reportable quantities, Chemical Abstract Service (CAS) number, and emergency contact phone number of each.

A plot plan of the Elkton facility showing the emergency exits, fire extinguishers, fire monitor nozzles, fire alarm boxes, post indicator valve, and classified areas is attached, Appendix F.

When a spill or release of any substance occurs, all possible action must be taken to stop and / or minimize the amount of the release. However, regulations require the release of oil or CERCLA hazardous or toxic (313) substances to be reported immediately to the proper emergency response agencies should the release exceed the reportable quantity.

The proper reporting procedures are given on the flowchart in Appendix B, as well as the telephone notification requirements in Appendix C. The list of CERCLA, toxic substances, and CAA substances is shown in Appendix A.

Internal Corporate EH&S reporting is required for all releases that result in (1) a permit exceedance, (2) a report or notification to government authorities, (3) a third-party contact, or (4) a significant environmental event. A significant environmental event is an event that had the potential for items (1), (2), or (3), but fell short of that consequence. Examples of significant environmental events are permit levels within 50% of the permit limit or spills within 50% of the reportable quantities (RQ's). The first form in Appendix D should be completed and sent to Corporate EH&S, with a copy in plant files (E4.1).

The external written report form in Appendix D must be submitted to the Regional Administrator within 15 days after reportable spills. Duplicates must also be sent as soon as possible to the Local Emergency Planning Committees for all affected counties. The environmental incident report must be completed and stored in the environmental files.

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Before operating procedures are resumed in the affected area(s) of the facility, the owner or operator must notify the Regional Administrator, and appropriate State and local authorities, that no waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed; and all emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

#### XIV. TRAINING

Manufacturing, maintenance, shipping, and laboratory personnel will be trained annually in regards to this procedure. This plan will be incorporated as part of the regular safety meeting program, and will be reviewed on an annual basis.

##### Type of Training

1. Management

Management personnel attend a variety of short courses and seminars, both in-company and outside, on handling hazardous waste and /or on-the-job training. As training needs for these positions varies widely, no set program is established.

2. Hourly

Each hourly employee is trained initially as a part of the Ashland New Employee Safety Training. The training includes RCRA Procedure Training, Emergency Procedure Training, General Evacuation Procedures, Handling of Hazardous Material, Right-to Know training and TSCA Training. This training is completed in the first 30 days of employment, and no employee is allowed to work in his own until this training is complete. Documentation of this training is maintained in each employee's personal file and/or LMS. This training is both classroom and on-the-job training.

Each employee has annual review training the RCRA Procedure (PRSP 58), Hazwoper (PRSP 45), Emergency Procedures, Right-to-Know, TSCA, Spill Prevention and Countermeasure, and Handling of Hazardous Materials.

General Evacuation Drills are conducted quarterly. Documentation of this training is maintained in the Safety Files (periodic inspections, evacuation drill).

Once per year, as a part of the Annual Fire Training, the local fire department employees will be given a plant tour identifying the chemical storage locations, location of all in-plant fire fighting equipment and the overall layout of the facility.

#### XV. PENALTIES

- A. Failure to report a spill of a hazardous substance is subject to criminal penalties of up to \$10,000 and/or one year imprisonment.
- B. The Coast Guard may assess a civil penalty of up to \$5,000.
- C. The Spiller may be liable to the Federal Government for clean-up costs up to \$50,000,000 per spill, except in the case of gross negligence, where there is no limit.
- D. The EPA may commence a civil action to impose a penalty, not to exceed \$50,000.

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**XVI. COST ESTIMATE FOR FACILITY CLOSURE**

Closure of the Plant would require removal of 16,000 gallons of caustic methanol solution. The intent would be to transfer the solution to another Ashland, Inc. facility for continued use. If, for any reason, this was not possible, disposal would cost approximately \$41M at DuPont and approximately \$48M at LWD.

T/S/D CLOSURE PLAN - 08 SEPTEMBER 1987

CAUSTIC-METHANOL STORAGE

(Not stored as a hazardous waste - inclusion of costs assumes a requirement for a total plant shutdown.)

1.) Basis at DuPont Chambers Works

\$2.42/gallon x 16,000 gallons (maximum volume) = \$38,720  
4 loads @ \$3,081/load = \$12,324  
TOTAL = \$51,044

2.) Basis at LWD

\$2.85/gallon x 16,000 gallons (maximum volume) = \$45,600  
4 loads @ \$3,081/load = \$12,324  
TOTAL = \$57,924

**XVII. USE OF MANIFEST**

Each load of spent Caustic Methanol sent to the DuPont Chambersworks in Deepwater, New Jersey or LWD in Calvert City, Kentucky, is manifested according to CFR 262.21.

Each manifest included the following information:

1. Generator's Name and Address
2. Generator's US EPA ID Number
3. Manifest Document Number
4. The Hazardous Waste Manifest Number
5. The Transporter's Name
6. The Transporter's EPA ID Number
7. The Waste Treatment Facility's Name and Address
8. The Waste Treatment Facility EPA ID Number
9. The State Transporter's ID Number
10. The Transporter's Phone Number
11. The Waste Treatment Facilities' Phone Numbers
12. The DOT Description of Material (flammable liquid, corrosive)
13. The Waste ID Number
14. The Container Type
15. The Quantity of Material with Units
16. The Waste Class Number "D001" and "D002"
17. The Physical and Chemical Description of the Material
18. The Handling Code for the Waste
19. Under Special Handling Instructions
  - a. Facility's Contract Number and Release Number
  - b. Maryland Permit Number

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- c. Maryland Hauler ID Number
- d. The Compartment Seal Numbers
- e. The Facility's State Decal Number
- 20. The Plant Manager's Signature and Name
- 21. The Date of the Shipment
- 22. The Truck Driver's Signature and Name

Once the trailer is filled and weighed, all trailer openings are sealed with the seal numbers being noted on the manifest.

Once the manifest is completed and signed by the truck driver and Plant Manager, four copies are given to the truck driver; one copy is mailed to the Facility's State if disposed of in New Jersey, one copy is mailed to Maryland, one copy is sent to the Waste Treatment Facility, and one copy is filed at the Elkton Plant. There are a total of eight (8) copies of this manifest.

The Waste Treatment Facility upon receiving the load will send one copy of the manifest to the Facility's State, one copy of the manifest to Maryland, and one copy of the manifest back to the Ashland, Inc., Elkton Plant.

The Facility will file two copies of the manifest and the transporter will retain a file copy of the manifest.

The Ashland, Inc., Elkton Plant will match up the returned copy of the manifest with the original. If a returned copy from the Facility is not received within 30 days, the Ashland Plant will contact the Facility's State in writing.

- The New Jersey Manifest Form Number is VHW-001 Rev. 9/86.
- The Maryland Manifest Form Number is 8700-22 Rev 9/88.

#### **XVIII. HAZARDOUS WASTE MINIMIZATION PLAN**

Starting with the reports for CY 1986, the Hazardous Waste Minimization Plan is included as part to the State of Maryland Hazardous Waste Generator Report.

#### **XIX. HISTORICAL DATA**

- A. SARA III Spills  
Spills involving SARA III chemicals since 1989 are recorded in the Near Miss Reports File located in the Main office area.
- B. Sampling Data  
Storm water analysis results are contained in Environmental File 24.1. The outfalls will be retested when warranted by spills or discharges.

#### **REVIEW AND REVISION**

This procedure will be reviewed annually and revised if required.

APPROVED: \_\_\_\_\_  
Plant Manager